

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL JENKINS, *et al.*

Plaintiffs,

v.

RANKIN COUNTY, MISSISSIPPI, *et al.*,

Defendants.

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**Civil Action No.
3:23-cv-374-DPJ-ASH**

**PLAINTIFFS' MOTION TO EXTEND RESPONSE TIME TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT [DOC. 132]**

Come now, the Plaintiffs, by and through counsel, and pursuant to L.U. Civ. R 7, hereby moves the court for an order extending the time for Plaintiffs to respond to Defendant Bryan Bailey's Motion for Summary Judgment regarding the issue of qualified immunity. In further support of this motion the Plaintiffs aver as follows:

1. On March 17, 2025, Defendant Bailey filed a motion for summary judgment on the issue qualified immunity. Pursuant to the scheduling order dated January 30, 2025 [Doc. 98], the current deadline for filing Plaintiffs' response to that Motion is March 31, 2025.

2. Because of other professional obligations that preceded the filing of Defendant Bailey's motion, undersigned counsel are limited in the time that they have to address this very important and significant litigation which the Defendants are seeking to have dismissed.

3. In addition, there remain outstanding discovery issues before Magistrate Judge Harris that have yet to be resolved.

4. Consequently, Plaintiffs are seeking a relatively short fourteen (14) day extension of time, up to and including April 14, 2025, to respond to Defendant Bailey's dispositive motion.

Wherefore for the reasons stated herein and in the record of this proceeding, the Plaintiffs respectfully urge the court to grant Plaintiffs' motion and issue an order extending the deadline for responding to Defendant Bailey's dispositive motion as requested.

CERTIFICATION OF COUNSEL

Prior to filing this motion, Plaintiffs' counsel requested the consent of Defendant Bailey through his counsel via email on Friday March 21, 2025. To date there has been no response by Defendant's counsel to that email communication.

Respectfully submitted by:

/s/ MALIK SHABAZZ ESQ /S/
MALIK SHABAZZ, Esq.
The Law Office of Malik Shabazz, Esq.
[admitted Pro Hac Vice]
700 Pennsylvania Ave SE
Washington, DC 20003
[Email: attorney.shabazz@yahoo.com](mailto:attorney.shabazz@yahoo.com)
Tel: (301) 513-5445
Fax: (301) 513-5447
(Lead counsel for Plaintiff)

/S/ TRENT WALKER ESQ /S/
TRENT WALKER, Esq.
The Law Offices of Trent Walker
M.S.B. 10475
5245 Keele Street Suite A

Jackson, Mississippi 39206

Email: Trent@Trentwalkeresq.com (Mississippi
Local Counsel)

(601) 321-9540

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of March, 2025 I have electronically transmitted this Motion for Extension to opposing counsel.

/s/Malik Z. Shabazz/s/

Malik Z. Shabazz Esq.